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January 8, 2010

Mr. James Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

**Re: Monthly Progress Report for December 2009, North Bronson Industrial Area
Site Operable Unit 1, Bronson, Michigan**

Dear Mr. Hahnenberg:

The North Bronson Potentially Responsible Parties Group (the Group) submits this monthly progress report to the U.S. Environmental Protection Agency (USEPA), Region 5, pursuant to Article X (Reporting Requirements), Paragraph 31 of the Consent Decree for Operable Unit 1 at the North Bronson Industrial Area (NBIA) Site. This report summarizes efforts by the Group to fulfill the requirements of the Consent Decree for Remedial Design and Remedial Action (RD/RA) at the site during December 2009.

1. Activities Completed During This Reporting Period

- A. On December 9, 2009, the Group submitted the November 2009 monthly progress report to USEPA with copies to the Michigan Department of Environmental Quality (MDEQ).
- B. On December 18, 2009, representatives of USEPA, MDEQ, and the Group met by conference call to discuss the completion of the Western Lagoon Area Groundwater Delineation Study and the proposed City of Bronson groundwater restriction ordinance.
- C. Via letter dated December 29, 2009, USEPA approved the *County Drain #30 Sediment and Soil Sampling Work Plan*, as revised and clarified in the Group's letter to USEPA of December 1, 2009.

- D. In cooperation with the City, the Group arranged to connect the residence at (b) (6) in Bronson to the City water system. The private well at this location is scheduled to be abandoned in the spring of 2010, coincident with the other private well closures in the Restricted and Buffer Zones defined in the proposed City of Bronson groundwater restriction ordinance.

2. Results of Sampling and Tests and Other Data

- A. The Group developed no sampling or test data during the reporting period.

3. Work Plans, Procedures, and Deliverables

- A. In response to discussions among the Group, USEPA, and MDEQ on November 6, 2009, the Group revised and clarified the *County Drain #30 Sediment and Soil Sampling Work Plan* via letter dated December 1, 2009.
- B. The Group submitted no other work plans, procedures, or deliverables during the reporting period.

4. Actions Projected for Next Six-Week Period

- A. The Group will respond to issues raised in the December 18, 2009 conference call regarding the completion of the Western Lagoon Area Groundwater Delineation Study and the proposed City of Bronson groundwater restriction ordinance.
- B. The Group will work with USEPA to establish a schedule for implementing the *County Drain #30 Sediment and Soil Sampling Work Plan*. The timing of this work is weather-dependent, as the ground is now frozen and sediments and soils cannot be efficiently sampled.
- C. Other actions projected for the next six-week period depend on the timing of USEPA approvals and authorizations to proceed, as described in Item 5.A below.

5. Progress and Schedule Report

- A. Near-term milestones for on-going Group activities are as follows:

Western Lagoon Area Groundwater Delineation Study

- Following USEPA approval, the Group will complete the Western Lagoon Area Groundwater Delineation Study, including installation of

additional wells as described in our project review meeting discussion of March 17, 2009 and a second round of groundwater sampling of newly installed wells. The estimated timeframe for this activity, including laboratory analysis, data validation, and reporting, is eight weeks after mobilization.

County Drain #30 Sediment and Soil Sampling

- The Group will work with USEPA to establish a schedule for initiating the *County Drain #30 Sediment and Soil Sampling Work Plan*. The projected schedule for this activity is provided in the corresponding work plan.

Private Well Connections

- The remaining City water connections for residents within the Restricted and Buffer Zones with private wells are scheduled for the spring of 2010.
- B. As discussed in our project review meeting of March 17, 2009, progress related to RD/RA for enhanced source control at the Eastern and Western Lagoon Areas and County Drain #30 remediation requires resolution of appropriate cleanup standards for sediments, non-erodible soils associated with County Drain #30, and groundwater to surface water interface criteria.
- C. There are currently no other unresolved issues that affect the performance or timing of pre-design or RD activities.

6. Summary of Proposed or Approved Changes to the Work Plans or Schedules

- A. Each of the work plans for the ongoing tasks described in Item 5A above include addenda to the Pre-Design Studies Field Sampling and Quality Assurance Plan. These addenda provide for additional sampling and analytical protocols associated with those efforts. These work plans also include addenda to the site Health and Safety Plan to address task-specific health and safety issues.
- A. The near-term milestones associated with the most-recent working schedule update are those identified in Item 5.A above.

7. Activities Undertaken in Support of the Community Relations Plan

- A. Group representatives coordinated with the resident at [REDACTED] (b) (6) in Bronson to effect the connection of that residence to City water.

- B. The Group did not undertake any formal activities during this reporting period in support of the Community Relations Plan.

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We trust that this submittal satisfies your requirements at this time. If you have questions regarding this monthly progress report or related project matters, please do not hesitate to contact me.

Respectfully submitted,



Leo M. Brausch
Project Coordinator

LMB:

cc: Deborah D. Larsen, MDEQ
Charles W. Graff, MDEQ

cc (via email):
NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee